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November 9, 2021

Hon. Leda Dunn Wettre, U.S.M.J.
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07102

Re: Polynice v. New Jersey Department of Corrections, et. al
Civ. Dkt. # 2:19-16875-MCA-LDW

Dear Judge Wettre,

The undersigned counsel represents Administrator George Robinson (hereinafter "Represented Defendant") in the above captioned matter.

Plaintiff's counsel and I conferred and decided to submit a joint status update. We request the DED be extended to December 10, 2021 as Plaintiff's deposition is scheduled for December 7, 2021. Any dispositive motion sought by the defense to be filed by January 25, 2022 with opposition due by March 11, 2022 and a reply by March 18, 2022.

Respectfully submitted,

Andrew J. Bruck
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: s/ Chanell Branch
Chanell Branch
Deputy Attorney General

